SOUTHERN DISTRICT OF NEW YORK	<b>Y</b>
RANK GROUP LIMITED,	: : No. 12 cv 3769 (GBD) (MHD)
Plaintiff,	:
- against -	: ECF Case
•	: AFFIDAVIT OF ANDREW R
ALCOA INC.,	: STANTON IN SUPPORT OF : DEFENDANT ALCOA INC.'S
Defendant.	: MOTION FOR ISSUANCE O
	: <u>LETTER ROGATORY</u> X
COMMONWEALTH OF PENNSYLVANIA	1
COMMON WEADIN OF TENIOTE VARIA	) ss.:
COUNTY OF ALLEGHENY	)

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ANDREW R. STANTON, being duly sworn, deposes and says:

- 1. I have been admitted to this Court *pro hac vice* in connection with the above-captioned lawsuit.
- 2. I am a partner with the law firm K&L Gates LLP, counsel for Defendant Alcoa Inc. ("Alcoa") in the above-captioned lawsuit. I have personal knowledge of the facts set forth below. I submit this Affidavit (i) in support of Alcoa's Motion for Issuance of Letter Rogatory; and (ii) to place before this Court true and accurate copies of the following documents:
- 3. Annexed hereto as Exhibit "A" is a true and correct copy of the [Proposed] Letter Rogatory.
- 4. Annexed hereto as Exhibit "B" is a true and correct copy of the [Proposed] Letter Rogatory translated into Spanish.
- 5. Annexed hereto as Exhibit "C" is a true and correct copy of the Certificate of Accuracy, attesting to the accuracy of the Spanish translation of the [Proposed] Letter Rogatory.

WHEREFORE, Defendant Alcoa Inc. respectfully requests this Court to (i) direct the issuance of the [Proposed] Letter Rogatory; and (ii) award Alcoa such other and further relief as this Court deems proper.

Andrew R. Stanton

Sworn to before me this 28th day of September, 2012

**Notary Public** 

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Carol S. Hemphill, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires March 21, 2016
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES